







Railroad Commission of Texas

Forms GW-1 & GW-2: Groundwater Protection **Determination Requests and Statewide Rules** 13, 14, 9, 46, 99 & 100 August 5, 2021

The meeting will begin shortly.





















August 5, 2021

Forms GW-1 & GW-2: Groundwater
Protection Determination Requests
and Statewide Rules
13, 14, 9, 46, 99 & 100
Rick Behal, P.G.
Tylynn Yezeski















Power Point Presentation



This presentation is available for download from the RRC website at https://www.rrc.texas.gov/oil-and-gas/workshops-and-conferences/rrc-regulatory-webinars-2021-schedule/

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- Who is the GAU
- What does the GAU do
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- Injection, Disposal & Fluid Level (H-1,W-14,H-15)
- GAU Tools and Techniques (Online demo)
- The Application and GAU letter (GW-1 & GW-2 -Online demo)

Who We Are



- Oil & Gas Division
 - -Technical Permitting
 - Groundwater Advisory Unit (GAU)
 - Injection Permitting and Support
 - Environmental Permits and Support
 - Engineering Unit

What We Do (1 of 3)



- Groundwater Determinations:
 - SWR 13: Set and cement sufficient surface casing to protect all usable quality water strata (BUQW)
 - New Drills, Injection, Re-entry, Recompletion,
 P&A, H-15, O&G Water Supply (W-1 if deeper than BUQW), Cathodic Protection

What We Do (2 of 3)



- Geologic Isolation (Forms H-1, W-14)
 - No injection is allowed in Underground
 Source of Drinking Water (USDW)*
 - Depth of sufficient isolation below BUQW/USDW
- Test for Inactive Wells (+25 yrs) (Form H-15)
 - If requesting an extended area of review,
 then GW-2 may specify for H-15 purposes

What We Do (3 of 3)



- Cathodic Protection and Microseismic wells
 - Required if depth is >30 feet (SWR 99 & SWR 100)
 - W-1 required if CP/MS well exceeds protection depth
 - Submit well schematic of CP/MS well with W-1
 - GW-2 for CP/MS wells cannot be used for other purposes

Water Classification



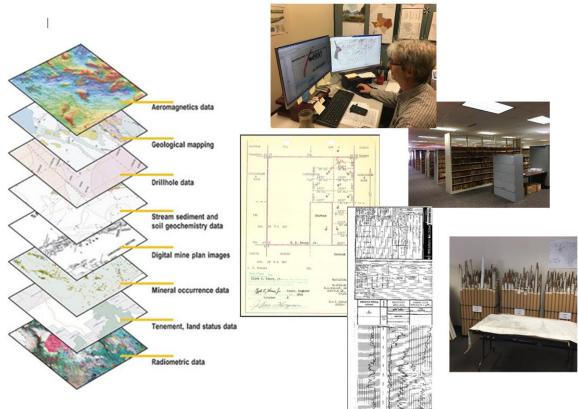
- Superior Quality Water (SQW) ≤ 1,000 ppm
 - Good tasting drinking water
- Base of Usable Quality Water (BUQW)<3,000ppm
 - Protection depth as define by SWR 13
- Underground Source of Drinking Water (USDW) < 10,000 ppm (Brackish)
 - Also protected by SDWA No injection allowed in the USDW*- Aquifer Exemption or EPA concurrence

GAU Tools and Techniques (1 of 4)



The GAU uses Geographical Information System (GIS)

- Operator Provided Information
- Other Government and NGO Web Resources
- Legacy Cloth Maps and Well Files

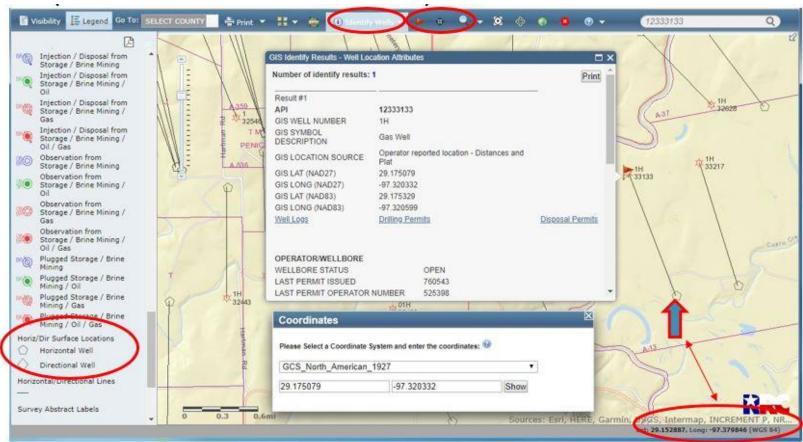


GAU Tools and Techniques (2 of 4)



RRC Public GIS Viewer

GIS tools for identifying wells and links to completion info and well logs



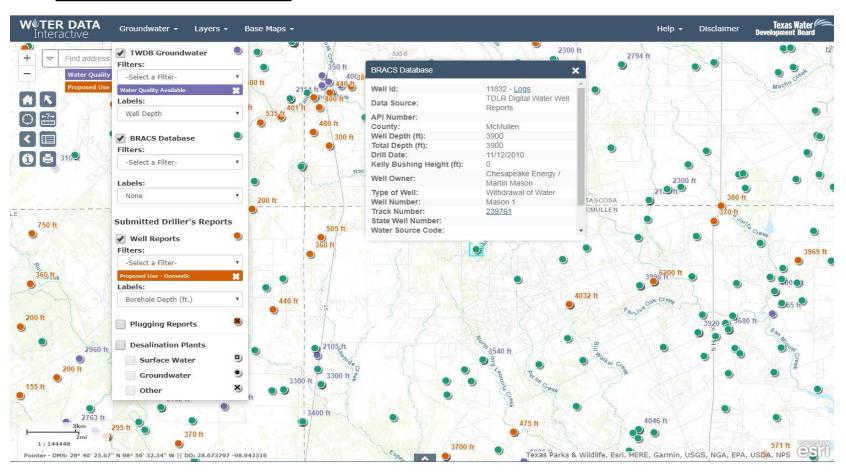
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GAU Tools and Techniques (3 of 4)



Texas Water Development Board – Water Data Interactive

 https://www3.twdb.texas.gov/apps/waterdatainteractive/groun dwaterdataviewer

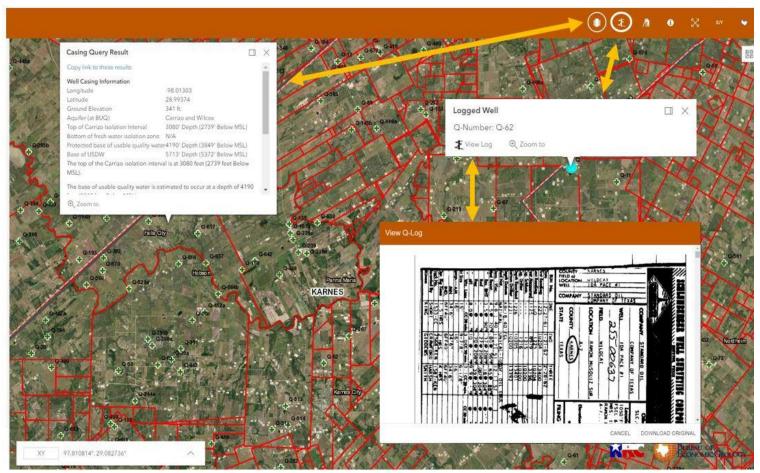


GAU Tools and Techniques (4 of 4)



Bureau of Economic Geology (BEG) – Surface Casing Estimator

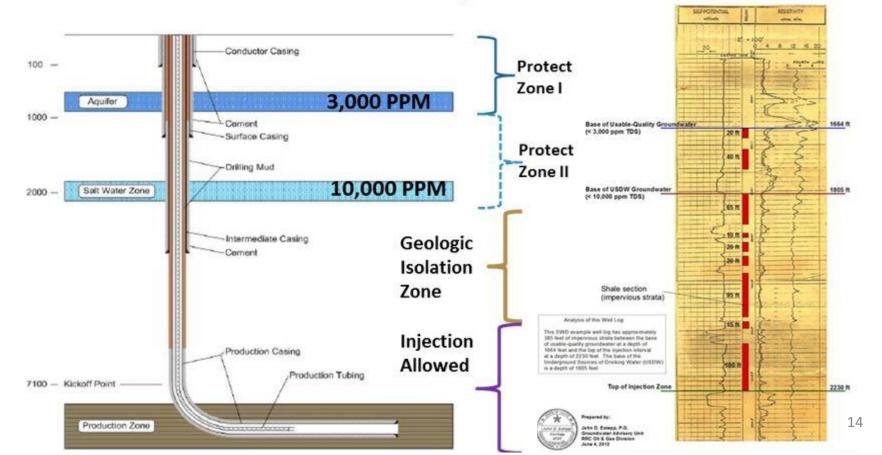
- Link via "GAU Links" or
- https://coastal.beg.utexas.edu/surfacecasing/#!/



How do we Protect?



- Provide Depths for Surface Casing, Cementing, and Plugging
- Locate Geologic Isolation For Injection Wells (H-1, W-14)
 - Depth of confining clay or shale below USDW is required 250'
 Below BUQW with 100' contiguous confinement



Casing and Cement (1 of 2)



- SWR 13 requires surface casing protect groundwater as stated in Groundwater Advisory Unit (GAU) letter (Form GW-2)
 - Surface casing protects usable-quality water from drilling/completion process
 - Cement prevents annular migration of fluids, corrosion of casing and isolates formation

Casing and Cement (2 of 2)



- SWR 14 requires plugs be set to isolate usable quality water strata and to separate any multiple UQW strata as determined by the GAU
 - Reason for multiple zones sometimes identified on GW-2
 - Plugs centered at protection depths

Attachments for H-1 and W-14



- Additional info is required for H-1 & W-14
 - Representative well log required for H-1 and W-14
 - Attach the Form H-1A or the W-14 (injection interval?)
- GAU issues "no harm" letter for W-14 in addition to the GW-2 Determination
 - No harm letter includes depth of geologic isolation (layers of clay/shale)

Reason for Filing



- Some GAU letters are multi-purpose, others are specific to the purpose of filing
 - Multi-purpose: New Well, P&A, Recompletion
 - Specific: H-1 & W-14 because review will include determination of the USDW and confinement necessary for UIC permit
 - H-15 multi-purpose or specific depending on the areal extent requested

Areal Extent or Well Specific

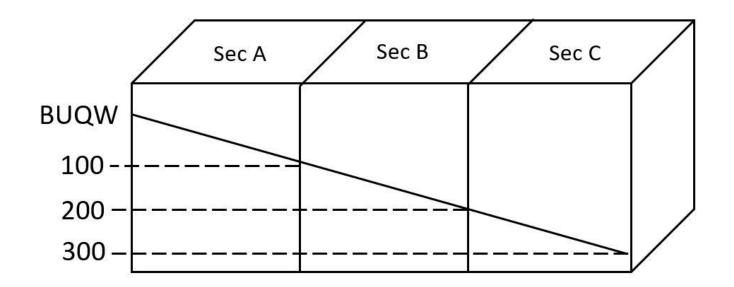


- Areal extent considered depends on the change in elevation to protection depth over the area requested
- Areal extent defined by section/survey or by the wells as specified (show on map)
- Specify the area or well API nos. in GW-1 remarks and/or attachment
- GAU letter will specify areal extent and/or list specific wells

H-15 Areal Extent



- H-15 Special Condition (H15SC)
 - Extended areal extent specific for H-15 filings
 - If BUQW varies >50 ft over the area requested,
 GW-2 will state the deepest BUQW
 - Example: BUQW 300 ft covering Sections A, B & C good for H-15 purposes only as stated in the GW-2



GAU Tools and Techniques



Online Demo

BEG – Surface Casing Estimator

Application (Form GW-1)



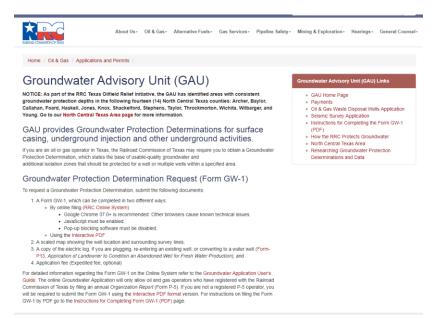
- Requests for Groundwater Determinations can be made one of two ways
 - Use the RRC On-Line System
 - Download a PDF form on the GAU Website
 - Email the completed GW-1 form to gau@rrc.texas.gov
 - · Send the completed GW-1 form through regular mail



Welcome to the RRC Online System

Main Application

- Account Administration
- Drilling Permits (W-1)
- Completions
- Groundwater (GW-1)
- <u>Digital Well Log Submission</u>



Menu and User Guide



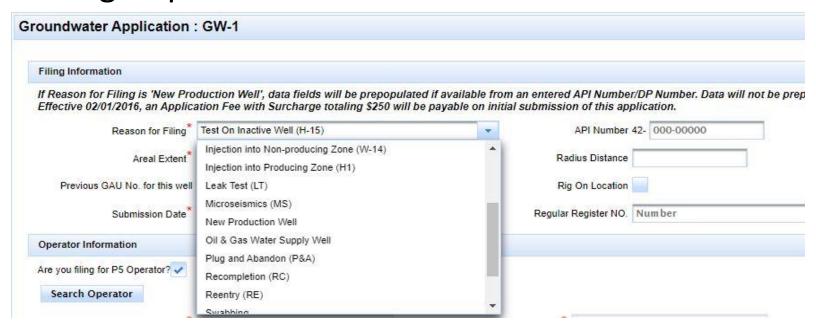
- My Applications (Status)
 - Check application status
 - "Draft" means not submitted
- Search for previous filings
- New Application
- User Guide



Reason for Filing



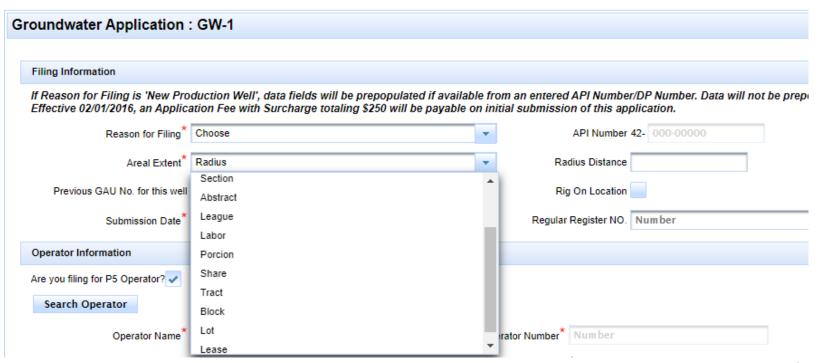
- GAU letters for UIC application must have the correct purpose of filing (H-1 or W-14)
 - Attach Form H-1A or W-14
 - Log required for H-1 and W-14



Areal Extent or Well Specific



- May request radius, section, abstract, lease...
- Specify wells in "Remarks" or attachment
- Show requested area on map (lease, survey, etc.)



Form GW-1 Demo

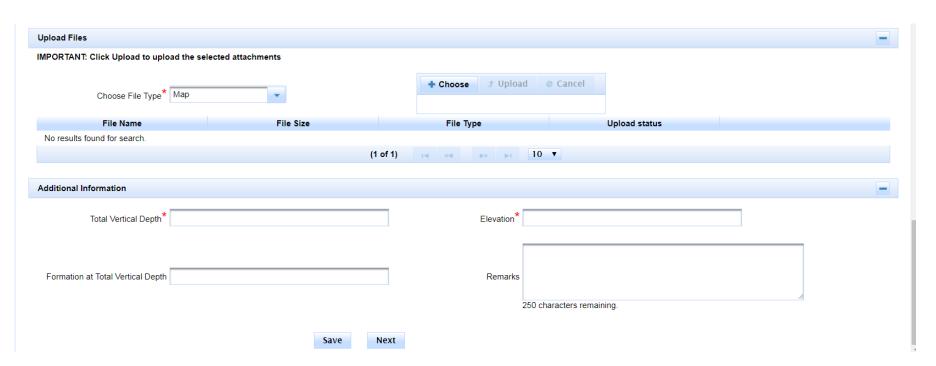


Demo of the Online Groundwater (GW-1)

Payment (1 of 3)



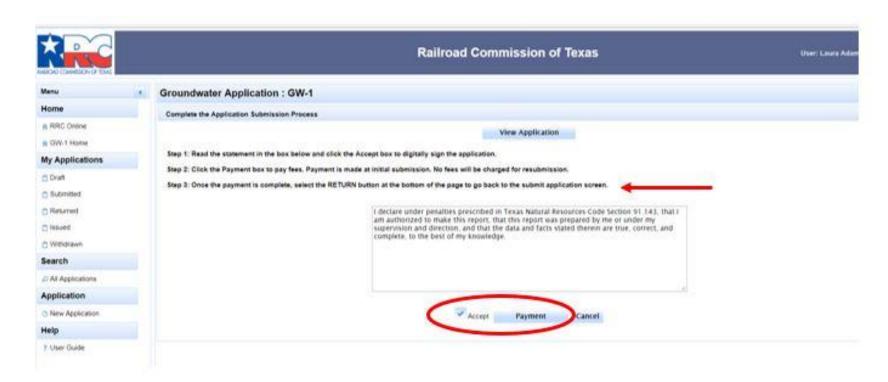
- "Next" at the bottom of the page to accept the terms and proceed to certification/payment.
- Warning! "Save" will save and exit! Oops! Return to GW-1 via Menu/My Applications/Draft



Payment (2 of 3)



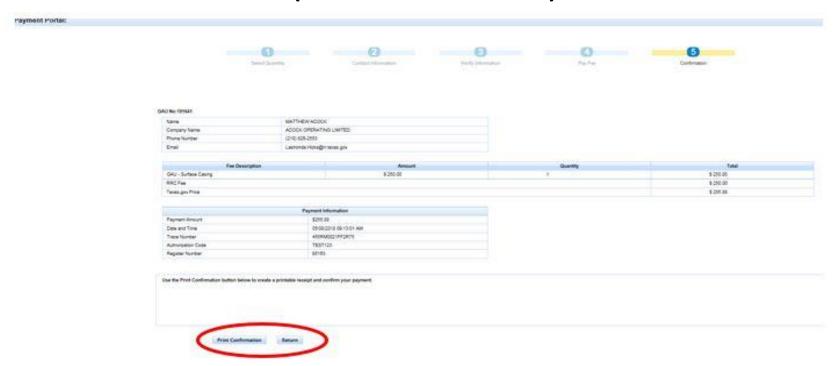
 Certification statement: Select to "Accept", then the "Payment" button to proceed to payment.



Payment (3 of 3)



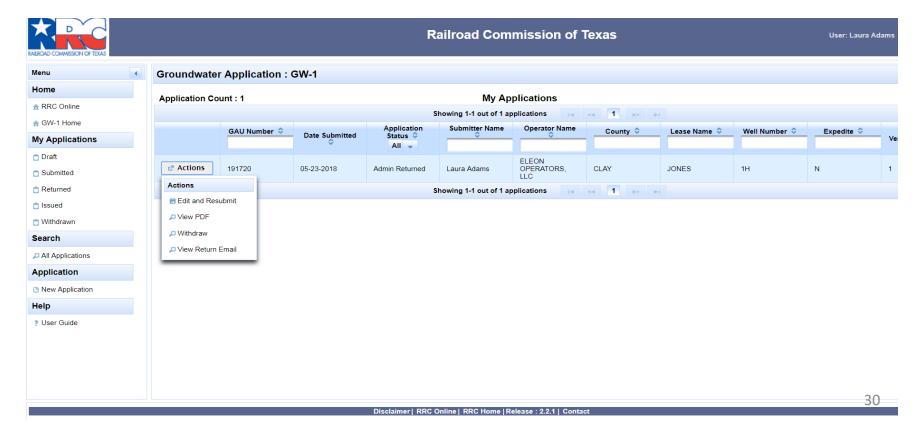
- "Print Confirmation" here (now or never!)
- "Return" to go back and finalize submitting the GW-1. Otherwise, the GW-1 remains in "Draft" status (not submitted)



Application Status



 If an application is returned, "Edit and Resubmit" to make changes to the application and resubmit.



GAU Letter Search



- Search for GAU letter using API, lease no. etc.
- Online GAU letters from June 2015 to current



Summary



- Filing online helps expedite
- No Special Characters (!@#\$%^&*) or Spaces
- Chrome Browser recommended
- Map/plat Info consistent with GW-1/W-1
- More data favors the desired outcome
- Shout out for more data (shallow log data)
- Questions? Rig on Location! Call Us ©

GAU Contact Info



Groundwater Advisory Unit	512-463-2741
James Harcourt, PG, Manager	463-2980 James.Harcourt@rrc.Texas.gov
Heather Hesskew	463-3184 Heather.Hesskew@rrc.Texas.gov
LaShonda Hicks	463-3052
Tylynn Yezeski	463-3003 Tylynn.Yezeski@rrc.Texas.gov
Valerie Atkins	463-7137
Cristian Astorga, PG	463-3013
Rick Behal, PG	463-6473 Richard.behal@rrc.Texas.gov
Norman Gearhart, PG	463-2937
Toni Eilerts, PG	463-7280
Karen Cassidy, PG	463-6209
Hank Zhao, PhD, PG	463-3313
Royce Massey, GIT	462-7017
Bryce McKee, PG	463-2259
Stephan Paetzold, PG	463-3163

Questions?





Questions?

Evaluation & Archive Video



Evaluation

 Please complete the evaluation available on the RRC website at https://survey.alchemer.com/s3/6403402/202
 1-RRC-Regulatory-Webinars-Oil-Gas-and-Pipeline-Safety-Evaluation

Archive Video

 A link to the archive video of the webcast will be available on the same webpage as the presentation.